

Exhibit F

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA

CERTIFIED TRANSCRIPT

DEPOSITION OF: MICHAEL PINSON

DATE: June 28, 2006
Wednesday, 9:00 a.m.

LOCATION: 150 East 8th Street
Erie, PA

TAKEN BY: Plaintiff
Gregory Goodwin

REPORTED BY: Cynthia A. Hawley
Notary Public
AKF Reference No. CH95362C

1 been on the job about a month.

2 And he came to me. He didn't
3 understand. We were, they were down almost the
4 entire shift. Didn't, wasn't sure how to
5 account for it. He didn't understand what the
6 equipment was doing. Dave had to come in that
7 morning and fix it and pulled up the MAC MAN
8 report and looked at it.

9 And Dave was our expert in terms of
10 interpreting that. And he was puzzled by some
11 of the moves. But we didn't make any
12 conclusions one way or the other about what
13 that might have meant.

14 Q. Eventually you must have made some conclusions
15 about what those moves meant?

16 A. I don't think we necessarily did.

17 Q. Well then why did you terminate Mr. Goodwin?

18 A. We terminated Mr. Goodwin because he was
19 slowing down the robot speeds, because he's a
20 disruptive force on the shop floor telling
21 employees let's fuck Accuride, giving the
22 junior employees a hard way to go about signing
23 up for overtime.

24 Q. Are there any reasons other than the reasons
25 given in your letter, which was previously

1 marked in Mr. Goodwin's deposition as
2 Deposition Exhibit 18? I would assume those
3 are the reasons Mr. Goodwin was terminated?

4 A. Yes.

5 Q. Certainly one of those reasons in there is
6 contributing to a work slow down/stoppage,
7 correct?

8 A. Yes.

9 Q. And you've already said that the production
10 data in and of itself doesn't really tell you
11 whether there was or was not a work slow down,
12 correct?

13 A. Correct.

14 Q. Neither for that matter does the MAC MAN data
15 regarding moves made on the lathe, isn't that
16 right?

17 A. Just tells you what moves were made.

18 Q. Yeah. Doesn't tell you whether that amounted
19 to a slow down or stoppage, does it?

20 A. No.

21 Q. And also given the fact that neither you nor
22 anybody else apparently in management bothered
23 to ask Mr. Goodwin what reasons, if any, he had
24 for those moves, even to this day. You don't
25 know what reasons Mr. Goodwin may have had for

1 didn't you?

2 A. Yes, I've seen the production data.

3 Q. I don't know if you remember, but I mean,
4 certainly you can look at the production data
5 and see that on the day in question back in
6 March of 2004 when Mr. Bruno felt compelled to
7 send Ms. Gore home, the result was that they
8 could only run one of the two lines?

9 MR. SAUNDERS: Objection. That's not
10 the testimony.

11 BY MR. CHIVERS:

12 Q. Do you know that, sir?

13 A. No, I do not know that.

14 Q. You could look at the production data and
15 determine that, couldn't you?

16 A. I spoke to Jerry Bruno. Jerry said they got
17 somebody from somewhere else in the plant and
18 they ran both lines.

19 Q. Hmm. Okay. All right. Did you bother to look
20 at -- you just accepted what Mr. Bruno said?

21 A. There were wheels produced on both lines that
22 night.

23 Q. You've been able to determine that by looking
24 at the data yourself?

25 A. Yes.

1 Q. Okay. Anyway, taking a look at this Deposition
2 Exhibit 18 from Mr. Goodwin's deposition, fair
3 to say, sir, that all those reasons given there
4 were integral to the termination?

5 A. I think so, yes.

6 Q. All right. I'm going to take two minutes, talk
7 to my client. Okay?

8 A. All right.

9 - - - -

10 (There was a discussion off the record.)

11 - - - -

12 MR. CHIVERS: I have no more
13 questions.

14 - - - -

15 EXAMINATION

16 - - - -

17 BY MR. SAUNDERS:

18 Q. I just have two. At the time that Mr. Goodwin
19 was discharged on July 23rd of '04 had you
20 received, did you know of the incident that
21 Mr. Russo testified this morning to concerning
22 the extended break?

23 A. Yes. I was aware of that.

24 Q. And had you received the, had you met and
25 talked to a coworker of Mr. Goodwin by the

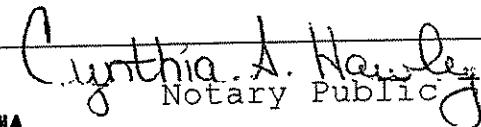
1 COMMONWEALTH OF PENNSYLVANIA) CERTIFICATE
 2 COUNTY OF ERIE) SS:
 3

4 I, Cynthia A. Hawley, a Court Reporter and
 5 Notary Public in and for the Commonwealth of
 6 Pennsylvania, do hereby certify that the witness,
 7 MICHAEL PINSON, was by me first duly sworn to testify
 8 to the truth; that the foregoing deposition was taken
 9 at the time and place stated herein; and that the
 10 said deposition was recorded stenographically by me
 11 and then reduced to printing under my direction, and
 12 constitutes a true record of the testimony given by
 13 said witness.

14 I further certify that the inspection, reading
 15 and signing of said deposition were NOT waived by
 16 counsel for the respective parties and by the
 17 witness.

18 I further certify that I am not a relative or
 19 employee of any of the parties, or a relative or
 20 employee of either counsel, and that I am in no way
 interested directly or indirectly in this action.

21 IN WITNESS WHEREOF, I have hereunto set my hand
 22 and affixed my seal of office this 17th day of July,
 23 2006.

24 
 25 Notary Public

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal

Cynthia A. Hawley, Notary Public

City Of Erie, Erie County

Commissioned July 20, 2006

412-261-2325

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Member, Pennsylvania Association of Notaries

Erie, PA

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AKF